

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

CASE NO.: 00-6309-CR-SEITZ (S)

MARK WEISS,

Magistrate Judge Garber

Defendant.

**DEFENDANT'S MOTION FOR PERMISSION TO TRAVEL**

COMES NOW the Defendant MARK WEISS by and through his undersigned counsel and moves this Court for the entry of an order temporarily modifying his bond reporting conditions so as to allow him to travel with his family on a brief four-day vacation and as grounds therefore would state as follows:

1. That on or about October 26, 2000 the defendant along with numerous other individuals was arrested as a result of a federal grand jury in this case returning an indictment at Ft. Lauderdale.
2. That as a result of an agreement with the Government also on October 26, 2000, the defendant was released on a \$100,000 personal surety bond. The agreement was ratified by the Court per U.S. Magistrate Judge Barry S. Seltzer in Ft. Lauderdale.
3. One of the conditions of the Defendant's bond that was imposed by Magistrate Judge Seltzer was that the Defendant's travel is restricted to the Southern District of Florida.
4. The Defendant wants to travel from August 27, 2001 through and including

September 2, 2001 to the Las Vegas, Nevada for three days and for four days to Saratoga Springs, New York area for vacation and to visit family. Travel permission is being sought for those dates. While in Las Vegas, the defendant will be visiting his brother, who recently relocated there.

5. The Defendant will be staying at the MGM Grand in Las Vegas and while in Saratoga Springs he will be staying with his cousin who resides at 11 Glen Drive in Saratoga Springs and he may be reached at (518) 587-3872.

6. Since the Defendant's release more than ten months ago, he has not violated any of this Court's bond conditions.

7. On August 6, 2001, the undersigned spoke with Mr. Jose Perez at United States Pretrial Services in Miami regarding his position on this matter and Mr. Perez has no objection to the granting of this motion.

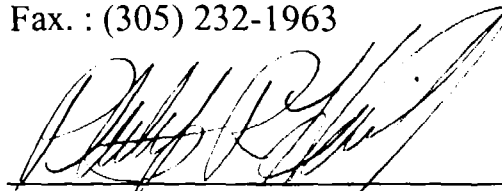
8. Pursuant to Local Rule 88.9 the undersigned also spoke with Assistant United States Attorney Brian McCormick also on August 6, 2001 regarding his position on this motion and Mr. McCormick objects to the granting of this motion.

WHEREFORE, the Defendant MARK WEISS respectfully requests that this Court enter an order modifying the bond conditions as requested above.

I HEREBY CERTIFY that a true and correct copy of the foregoing was mailed this 6<sup>th</sup> day of August 2001 to: J. BRIAN McCORMICK, ESQUIRE, Assistant United States Attorney, 500 East Broward Boulevard, Suite #700, Ft. Lauderdale, Florida 33301 and to MR. JOSE PEREZ, United States Pretrial Services Officer, 330 Biscayne Boulevard, Suite #500, Miami, Florida 33132.

Respectfully submitted,

LAW OFFICES OF PHILIP R. HOROWITZ  
Attorney for Defendant WEISS  
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A handwritten signature in black ink, appearing to read 'Philip R. Horowitz', written over a horizontal line.

By: PHILIP R. HOROWITZ, ESQUIRE  
Florida Bar No.: 466557